

SECRET

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) GREGORY D. ROBINSON,
[DOB: 04-14-1977],

(03) CYNTHIA D. GOODRICH,
[DOB: 09-20-1957],

(04) MUSTAFA K. EL-MIN a.k.a.
ANTHONY L. ROBINSON,
[DOB: 05-25-1970],

(05) APRIL D. WHITE,
[DOB: 04-27-1972],

(06) DONALD K. MARKS,
[DOB: 01-24-1983],

(07) EVERETT D. COURTNEY,
[DOB: 06-16-1972],

(08) RONALD J. BROOKS,
[DOB: 10-04-1965],

(09) HOWARD J. BOYD,
[DOB: 12-01-1962],

(10) JONATHAN C. MALLOW,
[DOB: 12-25-1989],

and

(11) ABBIE J. HENSLEY,
[DOB: 05-09-1987],

Defendants.

No. 20-03041-CR-01/11-S-MDH

COUNT 1

21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 846
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10,000,000 Fine
NLT 5 Years Supervised Release
Class A Felony

21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846
NMT 20 Years Imprisonment
NMT \$1 Million Fine
NLT 3 Years Supervised Release
Class C Felony

COUNT 2

21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years Imprisonment
NMT \$1 Million Fine
NLT 3 Years Supervised Release
Class C Felony

COUNTS 3, 7, and 13

21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years Imprisonment
NMT \$1 Million Fine
NLT 3 Years Supervised Release
Class C Felony

COUNTS 4, 5, 6, 8, 10, and 18

21 U.S.C. § 841(a)(1) and (b)(1)(B)
NLT 5 Years Imprisonment
NMT 40 Years Imprisonment
NMT \$5,000,000 Fine
NLT 4 Years Supervised Release
Class B Felony

Defendants/Counts:

(01) Robinson: 1, 4, 10-12, and FA
(03) Goodrich: 1, 2, and FA
(04) El-Min: 1 and FA
(05) White: 1, 14, and FA
(06) Marks: 1, 17-20, and FA
(07) Courtney: 1, 8, 9, and FA
(08) Brooks: 1, 13, and FA
(09) Boyd: 1, 5, 6, and FA
(10) Mallow: 1, 3, 7, and FA
(11) Hensley: 1, 15, 16, and FA

COUNTS 11, 15, and 19

18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment
(Consecutive to All Counts)
NMT Life Imprisonment
NMT \$250,000 Fine
NMT 5 Years Supervised Release
Class A Felony

COUNTS 9, 12, 16, 17, and 20

18 U.S.C. §§ 922(g)(1), (3) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT 14

21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

FORFEITURE ALLEGATION

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine and Any Amount of Heroin)
21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(C), and 846

Beginning on an unknown date, but at least as early as April 10, 2019, and continuing to on or about September 29, 2020, said dates being approximate, in Greene and Polk Counties, in the Western District of Missouri, and elsewhere, the defendants, **GREGORY D. ROBINSON, CYNTHIA D. GOODRICH, MUSTAFA K. EL-MIN a.k.a. ANTHONY L. ROBINSON, APRIL D. WHITE, DONALD K. MARKS, EVERETT D. COURTNEY, RONALD J.**

BROOKS, HOWARD J. BOYD, JONATHAN C. MALLOW, and ABBIE J. HENSLEY, knowingly and intentionally conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C); all in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine and Any Amount of a Mixture or
Substance Containing a Detectable Amount of Heroin)
21 U.S.C. § 841(a)(1), (b)(1)(A), and (b)(1)(C)

On or about June 12, 2019, in Greene County, in the Western District of Missouri, the defendant, **CYNTHIA D. GOODRICH**, knowingly and intentionally possessed, with intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 3

(Possession with Intent to Distribute Any Amount of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 26, 2019, in Polk County, in the Western District of Missouri, the defendant, **JONATHAN C. MALLOW**, knowingly and intentionally possessed, with intent to distribute, any amount of a mixture or substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 4

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 9, 2020, in Greene County, in the Western District of Missouri, the defendant, **GREGORY D. ROBINSON**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 5

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 11, 2020, in Polk County, in the Western District of Missouri, the defendant, **HOWARD J. BOYD**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 6

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 25, 2020, in Greene County, in the Western District of Missouri, the defendant, **HOWARD J. BOYD**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine,

a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 7

(Possession with Intent to Distribute Any Amount of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about February 25, 2020, in Greene County, in the Western District of Missouri, the defendant, **JONATHAN C. MALLOW**, knowingly and intentionally possessed, with intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 8

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about March 3, 2020, in Greene County, in the Western District of Missouri, the defendant, **EVERETT D. COURTNEY**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 9

(Possession of Firearm by Prohibited Person)
18 U.S.C. §§ 922(g)(1) and (3) and 924(a)(2)

On or about March 3, 2020, in Greene County, in the Western District of Missouri, the defendant, **EVERETT D. COURTNEY**, then knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and then knowing he was an unlawful user of a controlled substance, knowingly possessed a firearm, to wit, a Marlin brand, model 60, .22 caliber semi-automatic rifle, bearing serial number 16330831, and ammunition, and

the firearm and ammunition were in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and (3) and 924(a)(2).

COUNT 10

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about March 30, 2020, in Greene County, in the Western District of Missouri, the defendant, **GREGORY D. ROBINSON**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 11

(Possession of Firearms in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about March 30, 2020, in Greene County, in the Western District of Missouri, the defendant, **GREGORY D. ROBINSON**, did knowingly possess firearms, to wit: (1) an FNH brand, FNP-40 model, .40 caliber semi-automatic pistol, bearing serial number 61CMP11850; and (2) a Sturm Ruger brand, P89 model, 9mm semi-automatic pistol, bearing serial number 314-80742, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and any amount of a mixture or substance containing a detectable amount of heroin, as alleged in Count 1, and possession with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 10, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 12
(Possession of Firearms by Prohibited Person)
18 U.S.C. §§ 922(g)(1) and 924(a)(2)

On or about March 30, 2020, in Greene County, in the Western District of Missouri, the defendant, **GREGORY D. ROBINSON**, then knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, to wit: (1) an FNH brand, FNP-40 model, .40 caliber semi-automatic pistol, bearing serial number 61CMP11850; and (2) a Sturm Ruger brand, P89 model, 9mm semi-automatic pistol, bearing serial number 314-80742, and the firearms were in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 13
(Possession with Intent to Distribute Any Amount of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about June 2, 2020, in Greene County, in the Western District of Missouri, the defendant, **RONALD J. BROOKS**, knowingly and intentionally possessed, with intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 14
(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about June 2, 2020, in Greene County, in the Western District of Missouri, the defendant, **APRIL D. WHITE**, knowingly and intentionally possessed, with intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 15

(Possession of Firearm in Furtherance of Drug Trafficking Crime)

18 U.S.C. § 924(c)(1)(A)

On or about June 2, 2020, in Greene County, in the Western District of Missouri, the defendant, **ABBIE J. HENSLEY**, did knowingly possess a firearm, to wit, a Heritage brand, Rough Rider model, .22 caliber revolver, bearing serial number L02881, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and any amount of a mixture or substance containing a detectable amount of heroin, as alleged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 16

(Possession of Firearm by Prohibited Person)

18 U.S.C. §§ 922(g)(3) and 924(a)(2)

On or about June 2, 2020, in Greene County, in the Western District of Missouri, the defendant, **ABBIE J. HENSLEY**, then knowing she was an unlawful user of a controlled substance, knowingly possessed a firearm, to wit, a Heritage brand, Rough Rider model, .22 caliber revolver, bearing serial number L02881, and the firearm was in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 17

(Possession of Firearm by Prohibited Person)

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

On or about June 23, 2020, in Greene County, in the Western District of Missouri, the defendant, **DONALD K. MARKS**, then knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a Taurus brand, PT 111 G2A model, 9mm semi-automatic pistol, bearing serial number

TMU75851, and the firearm was in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 18

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about September 29, 2020, in Greene County, in the Western District of Missouri, the defendant, **DONALD K. MARKS**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 19

(Possession of Firearms in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about September 29, 2020, in Greene County, in the Western District of Missouri, the defendant, **DONALD K. MARKS**, did knowingly possess firearms, to wit: (1) a Polymer 80 brand, PF940C model, 9mm semi-automatic pistol, Privately Made Firearm (PMF) manufactured without a serial number; and (2) a Raven Arms brand, MP-25 model, .25 caliber semi-automatic pistol, bearing serial number 1756540, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and any amount of a mixture or substance containing a detectable amount of heroin, as alleged in Count 1, and possession with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 18, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 20
(Possession of Firearm by Prohibited Person)
18 U.S.C. §§ 922(g)(1) and 924(a)(2)

On or about September 29, 2020, in Greene County, in the Western District of Missouri, the defendant, **DONALD K. MARKS**, then knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a Raven Arms brand, MP-25 model, .25 caliber semi-automatic pistol, bearing serial number 1756540, and the firearm was in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **GREGORY D. ROBINSON, CYNTHIA D. GOODRICH, MUSTAFA K. EL-MIN a.k.a. ANTHONY L. ROBINSON, DONALD K. MARKS, APRIL D. WHITE, EVERETT D. COURTNEY, RONALD J. BROOKS, HOWARD J. BOYD, JONATHAN C. MALLOW, and ABBIE J. HENSLEY** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to. a forfeiture money judgment representing proceeds the defendants personally obtained, directly and indirectly, as a result of their participation in the drug conspiracy alleged in Count 1.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

/s/ Kevin Elliott

FOREPERSON OF THE GRAND JURY

/s/ Jessica Sarff

JESSICA R. SARFF

Assistant United States Attorney

DATED: 01/19/2021

Springfield, Missouri